

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-CV11829 GAO

ROBERT S. STEPHENS,
Plaintiff

V.

ROBERT MULHERN, individually
and as Police Chief of the Town of
Groton,
PETER S. CUNNINGHAM,
individually and as a Selectman for
the Town of Groton,
THOMAS D. HARTNETT individually
and as a Selectman of the Town of
Groton,
DANN CHAMBERLIN, individually
and as a Selectman of the Town
of Groton,
"JOHN DOE" and
THE TOWN OF GROTON,
Defendants.

DEFENDANTS' FIRST SET OF INTERROGATORIES TO THE PLAINTIFF,
ROBERT S. STEPHENS

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, the Defendants, Robert Mulhern, Peter S. Cunningham, Thomas D. Hartnett, Dann Chamberlin, and the Town of Groton, demand that the Plaintiff, Robert S. Stephens, answer fully, separately, and under oath the following interrogatories.

DEFINITIONS

The word "incident" as used herein shall mean the circumstance of events on May 2, 2001, which are the basis for the allegations asserted to in the Complaint.

INTERROGATORIES

INTERROGATORY NO. 1

Please identify yourself, including you name, age, date of birth, social security number, residential address, occupation and business address, or if

attending school, the name of the school (s), including address (es), you have attended for the past five years and how long you've matriculated there. Please include in your answer if you have ever used or identified yourself by another name.

INTERROGATORY NO. 2

Please describe in detail your activities on May 2, 2001 from the time you awoke until the time of the incident (approximately 4 p.m.).

INTERROGATORY NO. 3

Please describe in detail all of your activities on May 2, 2001 from the time of the incident until you were released from the Groton Police Department.

INTERROGATORY NO. 4

Please describe each and every conversation that you had with any and all police officers on May 2, 2001 in the order in which conversations took place including your answer, the identity of the police officer(s), where you were when the conversation took place, what you said and what the police officer(s) said during each conversation, what, if anything, you did as a result of the conversation.

INTERROGATORY NO. 5

Please identify any and all documents, including notes written by you, which refer or relate to the allegations contained in your Complaint.

INTERROGATORY NO. 6

Please specify in detail any and all damage(s) that you suffered as a result of the allegations contained in your Complaint, including but not limited to any and all physical and/or emotional injury or illness you claim to have suffered.

INTERROGATORY NO. 7

Please state each and every date in which you were examined or treated by any doctor, physician or medical or mental health practitioner with respect to any injury or illness to have suffered as a result of the allegations in your Complaint, setting forth in details as each such date of examination:

- a. The name and address of each doctor, physician, medical or mental health practitioner;
- b. The nature and extent of the examination or treatment received from each such doctor, physician, medical or mental health practitioner;

- c. The diagnosis or prognosis by each doctor, physician, medical or mental health practitioner; and
- d. An itemized list of each charge made to you or any other person or organization on your account by each doctor, physician, medical or mental health practitioner.

INTERROGATORY NO. 8

If you have ever been arrested or charged or convicted of a crime in the United States, please state the nature of the offense, court in which you were charged, including date(s) or any conviction.

INTERROGATORY NO. 9

Please state the name and address of each and every person you believe to have discoverable knowledge regarding any of the facts, events, and allegations set forth in your Complaint, inscribe your understanding of the knowledge that each such person possesses.

INTERROGATORY NO. 10

If you reported any details of this incident to anyone (excluding your attorney), please state the name and address to each person to whom you reported the occurrence.

INTERROGATORY NO. 11

Please state the full name and address of each and every person who you intend to call as an expert witness at trial including the subject matter on which each such expert is expected to testify and the substance of the facts and opinions to which each such expert is expected to testify.

INTERROGATORY NO. 12

Please identify and describe any and all other litigation matters you have been involved in, either as a party or as a witness.

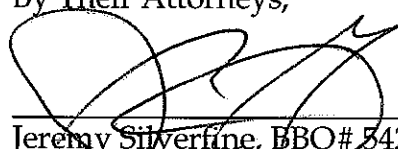
INTERROGATORY NO. 13

Please list all the weapons that you owned, possessed or controlled (including but not limited to) firearms, and rifles as of May 2, 2001.

INTERROGATORY NO. 14

Please list any and all the firearms identification cards (FID) that you have ever held, including the name(s) of the town, which granted you said card.

Respectfully Submitted,
Defendants,
Robert Mulhern, Peter S. Cunningham,
Thomas D. Hartnett, Dann Chamberlin, and
the Town of Groton,
By Their Attorneys,



Jeremy Silverfine, BBO# 542779
Leonard H. Kesten, BBO# 542042
BRODY, HARDOON, PERKINS & KESTEN
One Exeter Plaza, 12th Floor
Boston, MA 02116
(617) 880-7100

Date:

6/23/05

CERTIFICATE OF SERVICE

I, hereby certify that a true copy of the above document was served upon
all counsel of record by first class mail on 6/23/, 2005.



Jeremy Silverfine